



**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION 10**

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OFFICE OF
ENVIRONMENTAL
CLEANUP

LDJRR/LDWSF
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08/15/2014

August 15, 2014

Mr. Miles Dyer
Acting Director, Environmental Compliance
Senior Staff Environmental Engineer
Jorgensen Forge Corporation
8531 E. Marginal Way S
Tukwila, Washington 98108

Mr. Will Ernst
EO&T EHS Remediation
The Boeing Company
PO Box 3707 M/C 1W-12
Seattle, Washington 98124

Re: EPA Comments -- Sampling and Analysis Procedures for Sheetpile Residue and
EPA Requirements on Staging of Sheetpile, Jorgensen Forge Outfall Project, Lower
Duwamish Waterway Superfund Site, Seattle, WA

Dear Mr. Dyer and Mr. Ernst:

The U.S. Environmental Protection Agency has reviewed the Memorandum addressing the sampling and analysis procedures for the sediment residue on the Steel Sheetpile (SSP) of the in-water coffer dam at the Jorgensen Forge Early Action Area and is providing comments on the procedures that particularly apply to the staging of the SSP following removal.

The EPA is concerned regarding the SSP staging for several reasons. The largest being, however, that during the week of 8/25/14: the uplands of the site will be clean (i.e., decontaminated, bank work will be complete) and the in-water dredging schedule has the dredging completed by the EMJ team in accordance with their agreed order. EPA is concerned about cross contamination from PCB contaminated sediment residues from the SSP with the clean bank and shoreline sediments.

The EPA is therefore hereby not approving placing/storing the sheet pile walls within EMJ Removal Site. Pacific Pile and Marine anticipates completing the bank removal work the weekend of 8/16/14. The uplands of the site will be decontaminated next week (~ 8/20/14). The EPA does not want contaminated sheet pile material placed on the clean uplands,

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especially because clean bank materials will be stored on the uplands and there must not be any chance of cross contamination as the project is finished.

In addition, the EPA will not require the EMJ team to decontaminate the sheet pile walls or treat the water. Nothing exists in the agreed order between EMJ and the EPA that would require the EMJ team to decontaminate the SSPs and associated wash water. Also, the uplands system for capturing contaminated water and treating will be gone by the week of 8/25/14 as the entire uplands that is part of the EMJ Remedial Action footprint will be decontaminated at that point in time. The current area where excavated bank material will be stored will now hold the clean backfill. No place to decon or treat the decon water in the uplands will exist and the EPA does not want dirty water or material, in the clean upland or near clean bank material. Additionally, as the in-water dredge will be complete, no WQ barge will be available to dewater or treat the material. By then, backfilling will be occurring and the dredge barge will be replaced with the clean backfill barge.

Jorgensen and Boeing will need to ensure the EPA that the sheet pile walls are not placed within the EMJ Removal Action Boundary, and that appropriate BMPs are in place to prevent re-contamination of the clean sediment and bank and cross-contamination of the clean backfill/bank materials is prevented.

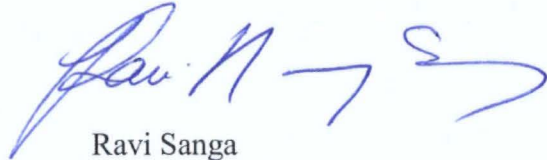
Lastly, during removal of the sheetpile, all adhered sediments must be retained and the upland storage area and the wrapping of the sheetpile that is being proposed must absolutely protect and confine the sheetpile and any associated sediments from contaminating the newly cleaned back and in-water sediments.

The Memorandum must also address the following:

- A figure showing the proposed staging area and that this area is indeed outside of the EMJ Removal Action Boundary
- A figure depicting the approximate water level that the residue will be sampled
- Samples will need to be taken from all 3 SSP
- Independent third party validation will occur for the resulting data in order to ensure that the data are appropriate for Superfund Decision making purposes

Within 10 days upon receipt of this letter, a revised memo needs to be provided to the EPA that addresses the aforementioned concerns. Should you have any questions I can be contacted at sanga.ravi@epa.gov or 206 553-4092. Inquiries of a legal nature need to be addressed to Richard Mednick at mednick.richard@epa.gov or 206-553-1797.

Sincerely,



Ravi Sanga
Remedial Project Manager
Site Cleanup Unit 3
Office of Environmental Cleanup

cc:

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